UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of	:	
	:	
PHILIPPE MARTINEZ,	:	Case No. 24-mc-306-RA-SN
MSR MEDIA SKN LTD.,	:	
	:	
Applicants, for an Order Pursuant to	:	
28 U.S.C. § 1782 to Conduct Discovery	:	
for Use in a Foreign Proceeding.	:	

MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE
TO WITHDRAW ATTORNEY APPEARANCE

PLEASE TAKE NOTICE THAT pursuant to Local Civil Rule 1.4, Applicants Philippe Martinez and MSR Media SKN Limited ("Applicants") move for leave of Court to withdraw the appearance of Calvin Lee as counsel for Applicants. Mr. Lee will leave the employ of Miller & Chevalier Chartered effective November 27, 2024, and he will assume a position with the United States Attorney's office in the Eastern District of California on December 2, 2024. *See* Affidavit of Calvin Lee in Support of Motion for Leave to Withdraw ("Lee Affidavit") ¶ 4.

No request for any change in schedule is being sought in connection with this motion, and the withdrawal of Mr. Lee will not unduly delay the case, will not be unduly prejudicial to any party, and will not otherwise be against the interests of justice. Applicants will continue to be represented by:

Sandeep Prasanna (#5463799)
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See Lee Affidavit ¶ 5. Neither Mr. Lee nor Miller & Chevalier is asserting a retaining or charging lien. *Id.* ¶ 6.

In light of the foregoing, Applicants respectfully submit that leave for withdrawal of counsel should be granted under Local Civil Rule 1.4.

Dated: November 15, 2024
       Washington, DC   Respectfully submitted,

/s/ Sandeep Prasanna
Sandeep Prasanna (Bar No. 5463799)
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